

2020R01190/JRE

UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

UNITED STATES OF AMERICA : Hon. Georgette Castner, U.S.D.J.
v. : Crim. No. 25-42
MOHAMMED RAHMAN : 18 U.S.C. § 1349

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JAN 21 2025

INFORMATION

(Conspiracy to Commit Wire Fraud) AT 8:30 _____ M
CLERK, U.S. DISTRICT COURT - DNJ

The defendant having waived in open court prosecution by Indictment, the
Acting United States Attorney for the District of New Jersey charges:

Background

1. At all times relevant to this Information:
 - a. Defendant MOHAMMED RAHMAN ("RAHMAN") resided in New Jersey and owned and controlled Caltech Trading Corporation ("Caltech"), which he purported to use to buy and sell commodities.
 - b. Co-Conspirator 1, a co-conspirator not charged in this Information, resided in South Korea. Co-Conspirator 1, together with other co-conspirators located in South Korea (the "South Korean Co-Conspirators"), purported to operate an investment company located in South Korea.

The Conspiracy

2. From at least in or around January 2019 through in or around October 2020, in the District of New Jersey and elsewhere, the defendant,

MOHAMMED RAHMAN,

did knowingly and intentionally conspire and agree with the South Korean Co-Conspirators and others to devise a scheme and artifice to defraud certain investors in South Korea and to obtain money and property by means of materially false and fraudulent pretenses, representations, and promises, and, for the purpose of executing and attempting to execute such scheme and artifice to defraud, to knowingly transmit and cause to be transmitted by means of wire communication in interstate and foreign commerce, certain writings, signs, signals, pictures, and sounds, contrary to Title 18, United States Code, Section 1343.

Goal of the Conspiracy

3. The goal of the conspiracy was to unlawfully enrich RAHMAN and the South Korean Co-Conspirators by soliciting and obtaining investors' funds through false and misleading pretenses, representations, and promises.

Manner and Means of the Conspiracy

4. It was part of the conspiracy that:

a. RAHMAN and the South Korean Co-Conspirators fraudulently induced individual investors in South Korea (the "Victim Investors") to invest over \$1,000,000 with RAHMAN in exchange for the promise that RAHMAN, through Caltech, would: (i) use the Victim Investors' funds to purchase sugar in Brazil; (ii)

resell the sugar to Ghana; and (iii) provide the Victim Investors with a guaranteed 100% rate of return on their investment within approximately 40 days.

b. Specifically, during in and around January and February 2019, the South Korean Co-Conspirators solicited and collected funds from the Victim Investors in South Korea.

c. To obtain the funds from the Victim Investors, the South Korean Co-Conspirators showed the Victim Investors an “Investment Agreement” between the investment company that the South Korean Co-Conspirators purported to operate and Caltech, dated January 31, 2019 (the “Fraudulent Agreement”). In the Fraudulent Agreement, Caltech: (i) agreed to use \$1,000,000 of the Victim Investors’ investment funds to purchase sugar from Brazil that Caltech would then sell to Ghana at a profit; and (ii) guaranteed returns of \$2,000,000 to the Victim Investors within 40 days after Caltech received the \$1,000,000 of the Victim Investors’ funds in its designated bank account.

d. Between on or about February 1, 2019 through on or about February 14, 2019, the South Korean Co-Conspirators deposited a total of approximately \$1,000,000 of the Victim Investors’ investment funds into RAHMAN’s business bank account. The South Korean Co-Conspirators kept for themselves the rest of the funds collected from the Victim Investors.

e. RAHMAN and Caltech never used the Victim Investors’ investment funds to purchase sugar from Brazil as agreed to in the Fraudulent Agreement. Instead, RAHMAN used the Victim Investors’ investment funds to pay

for personal and other expenses, including RAHMAN's mortgage on his personal residence.

f. To conceal that RAHMAN never used the \$1,000,000 of Victim Investor funds to purchase sugar from Brazil, RAHMAN altered his business bank account statement to make it appear as if he had used the Victim Investors' investment funds to purchase sugar from Brazil when in fact he had not.

g. RAHMAN then sent the fraudulent bank account statement to Co-Conspirator 1 in South Korea via text message to conceal the fraud from the Victim Investors.

h. In total, the scheme to defraud resulted in a loss to the Victim Investors of approximately \$1,393,200.

In violation of Title 18, United States Code, Section 1349.

FORFEITURE ALLEGATION

Upon conviction of the wire fraud conspiracy offense charged in this Information, defendant RAHMAN shall forfeit to the United States, pursuant to Title 18, United States Code, Section 981(a)(1)(C) and Title 28, United States Code, Section 2461(c), all property, real and personal, the defendant obtained that constitutes or is derived from proceeds traceable to the commission of such offense, including, but not limited to, a sum of money equal to \$1,000,000.

Substitute Assets Provision

If any of the property described above, as a result of any act or omission of the defendant:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third party;
- c. has been placed beyond the jurisdiction of the court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be divided without difficulty,

it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p), as incorporated by Title 28, United States Code, Section 2461(c), to seek forfeiture of any other property of the defendant up to the value of the forfeitable property described above.



VIKAS KHANNA
Acting United States Attorney

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INFORMATION FOR

18 U.S.C. § 1349

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